

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Case No. 2:23-cv-6188 (OEM)(ST)

SUPERB MOTORS, INC., TEAM AUTO SALES LLC.,  
ROBERT ANTHONY URRUTIA, 189 SUNRISE  
HIGHWAY AUTO LLC., NORTHSHORE MOTOR  
LEASING, LLC., BRIAN CHABRIER, individually and  
derivatively as a member of NORTHSHORE MOTOR  
LEASING, LLC, JOSHUA AARONSON, individually and  
derivatively as a member of 189 SUNRISE HWY AUTO,  
LLC, JORY BARON, 1581 HYLAN BLVD AUTO LLC,  
1580 HYLAN BLVD AUTO LLC, 1591 HYLAN BLVD  
AUTO LLC, 1632 HYLAN BLVD AUTO LLC, 1239  
HYLAN BLVD AUTO LLC, 2519 HYLAN BLVD  
AUTO LLC, 76 FISK STREET REALTY LLC, 446  
ROUTE 23 AUTO LLC, and ISLAND AUTO  
MANAGEMENT, LLC,

**DECLARATION OF COUNSEL  
FOR DEO DEFENDANTS**

Plaintiffs,

-against-

ANTHONY DEO, SARA DEO, HARRY THOMASSON,  
DWIGHT BLANKENSHIP, MARC MERCKLING,  
MICHAEL LAURIE, TOMAS JONES, CPA, CAR BUYERS  
NYC INC., GOLD COAST CARS OF SYOSSET LLC,  
GOLD COAST CARS OF SUNRISE LLC, GOLD COAST  
MOTORS AUTOMOTIVE GROUP LLC, GOLD COAST  
MOTORS OF LIC LLC, GOLD COAST MOTORS OF  
ROSLYN LLC, GOLD COAST MOTORS OF  
SMITHTOWN LLC, UEA PREMIER MOTORS CORP.,  
DLA CAPITAL PARTNERS INC., JONES LITTLE & CO.,  
CPA'S LLP, FLUSHING BANK, and LIBERTAS FUNDING,  
LLC,

Defendants.

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**DECLARATION OF JEFFREY BENJAMIN IN SUPPORT OF**  
**THE INSTANT MOTION FOR CONTEMPT**

Jeffrey Benajmin, pursuant to 28 U.S.C. § 1746, declares under the penalties provided by law that the following is true and correct:

1. I am counsel to the Deo Defendants and have knowledge of the facts recited herein.
2. This Declaration is likewise submitted in support of [Defendant HARRY THOMASSON's] instant Motion for Contempt of the Superb Plaintiffs relating to their violation of this Court's injunction (ECF # 55), as amended, including this Court's orders on May 9, 2025, May 21, 2025, and May 22, 2025.
3. On behalf of the Deo Defendants, I join Mr. Thomasson's Motion for Contempt, namely his Declaration and Memorandum of Law, filed today in compliance with the Court's June 23, 2025 Order directing same, in every respect. So as not to burden the Court with duplicative papers and arguments, I simply join those filed by Mr. Thomasson earlier this evening.
4. I repeat and reallege the facts, procedural history and legal arguments in the Declaration and Memorandum of Law of HARRY THOMASSON and incorporate them herein by reference as filed collectively at ECF Doc. #307.
5. It appears that multiple prior Court Orders as to the enjoined vehicles are simply not on the Plaintiffs' list of those with which they need to comply. Perhaps more egregious, this Court has formerly issued sanctions against Plaintiffs, and yet they still appear undaunted by those drastic adjudications.

6. As described in Mr. Thomasson's papers, the Plaintiffs now appear to be guilty of not only intentional ignorance of the prior Court Orders, but also of bad-faith, purposeful lack of candor with the Court, and at worst, misrepresentation.
7. Along with Mr. Thomasson, the Deo Defendants respectfully request, this Court grant the instant Motion in its entirety, and order an evidentiary hearing as to the above conduct of Plaintiffs, along with such other and further relief as the Court deems necessary, just, equitable and proper.

Dated: New York, New York  
June 30, 2025

Yours etc.

**THE LINDEN LAW GROUP, P.C.**

*Jeffrey Benjamin*

BY: JEFFREY BENJAMIN, ESQ.

*Attorneys for Certain Defendants (DEO)*

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